

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARTIN J. WALSH, Secretary of Labor, United States Department of Labor,	:	
	:	CIV. ACTION NO.
	:	
Plaintiff,	:	2:21-cv-00096
	:	
v.	:	
	:	
LOCAL 98, INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS,	:	Hon. Gerald A. McHugh
	:	
Defendant.	:	
	:	

**DEFENDANT'S ANSWER TO PLAINTIFF'S
MOTION TO AMEND COMPLAINT**

Defendant, Local 98, International Brotherhood of Electrical Workers, by and through its lawyers, Lamb McErlane PC, do not oppose Plaintiff's Motion to Amend the Complaint. However, Defendant reserves the right to seek dismissal of, and/or to have stricken, those portions of the Amended Complaint which do not comply with (a) this Court's Order and Memorandum dated April 14, 2021, or (b) the law and/or procedural rules, after the Amended Complaint is filed.

Respectfully submitted,

LAMB MCERLANE, PC

Dated: July 15, 2021

By: /s/ Joseph R. Podraza, Jr.

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MILTON AL STEWART, Acting Secretary	:	
of Labor, United States Department of	:	
Labor,	:	
	:	CIVIL ACTION NO.
<i>Plaintiff,</i>	:	2:21-cv-00096
	:	
v.	:	
	:	Hon. Gerald A. McHugh
LOCAL 98, INTERNATIONAL	:	
BROTHERHOOD OF ELECTRICAL	:	
WORKERS,	:	
	:	
<i>Defendant.</i>	:	

CERTIFICATE OF SERVICE

This is to certify that in this case a complete copy of the foregoing document was served upon the following counsel by email:

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Dated: July 15, 2021

LAMB McERLANE PC

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